

## ***LEEDS BROWN LAW, P.C.***

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April 1, 2020

**Via ECF**

Honorable Kenneth M. Karas  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10607

Re: *O'Hara v. Board of Cooperative Educational Services of Southern Westchester, et.al*  
Docket No.: 18-CV-8502 (KMK)(LMS)

Dear Judge Karas:

This office represents plaintiff Kathleen O'Hara in the above-referenced action. The purpose of this letter is to respectfully request, with the clear consent of defendants' counsel, that Your Honor grant a short extension of the deadline for plaintiff's opportunity to submit an amended complaint in this matter, until May 29, 2020, in light of the extraneous and utterly unique dangerous circumstance now impacting the lives of all due to the Covid-19 virus. We respectfully note that this situation is particularly dangerous for certain identified individuals, as per the CDC and all leading authorities, which include those with the protected class statuses brought by plaintiff within this instant action. Additionally, and as provided for by both Governor Cuomo, as well as the federal government, a stay-in-place order and social distancing has now been extended to April 30, 2020. Thus, this request is motivated by an extension of 30 days from the conclusion of this guideline. The unforeseen circumstances of the actions taken to hopefully successfully flatten the curve of the Covid-19 outbreak in New York have otherwise prejudiced plaintiff from a fair opportunity to further pursue the matter, through current or prospective counsel where advised.

The original schedule provided by Your Honor's March 16, 2020 Order, taking place mere days before Governor Cuomo's March 20, 2020 notice that New Yorkers should stay at home (going into effect on Sunday, March 22, 2020), specified that plaintiff serve such an amended complaint within 30 days, which would occur on April 15, 2020. This is plaintiff's first request for an extension of time, and plaintiff makes this request with consent of defendants, including specific discussions of the timing of the requested extension. The undersigned would not make this request but for the locally-felt and never previously known risk extended not only upon the plaintiff, but also to all parties associated with any personal interactions which may be requisite in the scope of such litigation.

As always, counsel for plaintiff thanks Your Honor for your attention and consideration in this matter.

Best regards,

LEEDS BROWN LAW, P.C.

/s/

Sean O'Hara

cc: All Counsel (*Via ECF*)